REMARKS

By this Amendment, Applicants have canceled claims 6, 12, and 19, without prejudice or disclaimer, amended claims 1 and 7, and added new claim 20. Claims 1-5, 7-11, 13-18, and 20 remain pending.

In the last Office Action, the Examiner rejected claims 1-18 under 35 U.S.C. § 112, ¶ 2 as indefinite, and rejected claims 1-19 under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,213,780 ("*Ho*").

Claims 6, 12, and 19

Applicants have canceled claims 6, 12, and 19, without prejudice or disclaimer. Accordingly, the rejection of claims 6, 12, and 19, under 35 U.S.C. § 112, ¶ 2 and § 103(a), is moot.

Rejection Under 35 U.S.C. § 112, ¶ 2

Applicants respectfully traverse the rejection of claims 1-5, 7-11, and 13-18 under 35 U.S.C. § 112, ¶ 2.

Claim 1 recites "validating the created role analysis profiles." The Examiner, at page 2 of the Office Action, alleges that "it is unclear how the validating of created role analysis profiles is performed." Applicants note, however, that "[d]efiniteness of claim language must be analyzed, not in a vacuum, but in light of . . . [t]he content of the particular application disclosure . . . ." M.P.E.P. § 2173.02 (8th Ed. August 2005). Accordingly, Applicants direct the Examiner's attention to paragraph [061] of the specification and claims 13-16, all of which provide examples illustrating the meaning of "validating the created role analysis profiles" in certain embodiments of the invention.

Applicants assert that one of ordinary skill in the art, relying on at least paragraph [061] and claims 13-16, would understand the meaning of the "validating . . ." limitation.

Further, M.P.E.P. § 2173.04 states that the "[b]readth of a claim is not to be equated with indefiniteness." Thus, even though the "validating . . ." limitation may encompass subject matter outside of the examples disclosed at paragraph [061] and claims 13-16, it does not render claim 1 indefinite, but rather indicates that the "validating . . ." limitation has a broad scope.

Rejection Under 35 U.S.C. § 103(a): Claims 1-5, 7-11, and 13-18

Applicants respectfully request withdrawal of the rejection of claims 1-5, 7-11, and 13-18 under 35 U.S.C. § 103(a) as unpatentable over *Ho* because the cited reference fails to teach or suggest each and every element of the claims.

Specifically, *Ho* fails to teach or suggest at least "interviewing subject matter experts of the organization using at least in part core task templates, to obtain information related to core tasks, formal training, technical knowledge, process knowledge, and problem solving skills of the roles in the organization," and "the role analysis profiles are organized to comprise a list of at least one core task, a list of at least one formal training requirement, a list of at least one process knowledge requirement, a list of at least one technical knowledge requirement, and a list of at least one problem solving skill," as recited in claim 1.

Ho merely discloses a computer-aided learning method for counseling and training a user for a job position. *Ho*, 2:14-17. Job positions may be classified in a hierarchy of job positions and may be further classified into sub-jobs. *Id.*, 5:56-60. For example, Fig. 4 of *Ho* illustrates a Job Position 250 with Job 1, Job 2, etc. below Job

Position 250, and Job 2 with Sub-job 1 and Sub-job 2 below Job 2. *Ho* further discloses a learning database that includes information on learning materials needed to accomplish a job. *Id.*, 5:64-67. The learning materials are modularized into learning material modules, which may further be classified into sub-learning material modules. *Id.*, 6:2-6. The learning material modules may be in different formats, such as a multimedia presentation, interactive presentations with questions and answers, or exercises. *Id.*, 6:10-13. In one example, the learning materials include a scenario on solving a problem in a job. *Id.*, 6:13-15.

Classifying job positions into a hierarchy of job positions and modularizing learning materials into learning modules, however, are not the same as and do not suggest "interviewing subject matter experts of the organization using at least in part core task templates, to obtain information related to core tasks, formal training, technical knowledge, process knowledge, and problem solving skills of the roles in the organization," as recited in claim 1. Further, having a hierarchy of job positions and learning modules is not the same as and does not suggest "creating . . . role analysis profiles [that] are **organized** to comprise **a list of at least one core task, a list of at least one formal training requirement, a list of at least one process knowledge requirement, a list of at least one technical knowledge requirement, and a list of at least one problem solving skill**," as recited in claim 1 (emphasis added).

Indeed, *Ho* teaches away from creating such role analysis profiles because it classifies job positions into a hierarchy of job positions and modularizes learning materials into learning modules. That is, *Ho* uses a different method with a different approach, which does not create "role analysis profiles [that] are organized to comprise

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a list of at least one core task, a list of at least one formal training requirement, a list of at least one process knowledge requirement, a list of at least one technical knowledge requirement, and a list of at least one problem solving skill."

On page 4 of the Office Action, the Examiner admits that *Ho* fails to disclose "interviewing subject matter experts," but alleges that it is old and well-known for a human resources department to either have subject matter experts for roles in the organization or to at least maintain such information from subject matter experts to be able to place people in appropriate roles in the organization. Even if this was true (which it is not), it still does not teach or suggest "interviewing subject matter experts of the organization **using at least in part core task templates**, to obtain information related to **core tasks, formal training, technical knowledge, process knowledge, and problem solving skills** of the roles in the organization," as recited in claim 1 (emphasis added). That is, the Examiner has not demonstrated that it is old and well-known to obtain information organized in the form of core tasks, formal training, technical knowledge, process knowledge, and problem solving skills using core task templates.

Accordingly, for at least the above reasons, *Ho* does not teach or suggest each and every element of claim 1, and the rejection of claim 1 under 35 U.S.C. § 103(a) as unpatentable over *Ho* should be withdrawn. Further, claims 2-5, 7-11, 13-18, and 20 depend upon allowable claim 1, and are allowable at least by virtue of their dependence upon allowable claim 1, in addition to the patentable subject matter respectively recited therein.

CONCLUSION

Applicants respectfully request reconsideration of this application and the timely allowance of the pending claims.
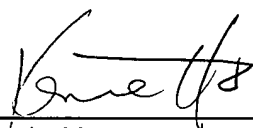
Further, Applicants note that the Office Action contains numerous statements reflecting apparent assertions concerning the claims and cited art. Regardless of whether any such statement is addressed specifically herein, Applicants decline to automatically subscribe to any assertion and/or characterization set forth in the Office Action.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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Dated: October 3, 2006   By:_____

Kenie Ho
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